



Commissioner J. Thomas Rosch

United States of America  
FEDERAL TRADE COMMISSION  
WASHINGTON, DC 20580

November 7, 2012

TO: Donald S. Clark, Secretary

FROM: Kelsey A. Buntjer

SUBJECT: COPPA Rule: Meeting Notes to be Placed on the Public Record

On November 7, 2012, Commissioner J. Thomas Rosch met with Jane Horvath, Director of Privacy at Apple, and Catherine Novelli, Vice President of Worldwide Government Affairs at Apple.<sup>1</sup> The purpose of the meeting was to discuss proposed changes to the FTC's COPPA Rule.

Ms. Novelli explained that Apple's main concern is the proposed language that expands the definitions of "operator" and "website or online service directed to children."

Ms. Horvath noted that Apple believed the proposed changes would place liability and an impossible burden on platform providers to police third-party apps to ensure COPPA compliance. She added that this requirement would go beyond Congress's intent for the rule.

Ms. Novelli and Ms. Horvath reiterated other concerns raised by Apple in its September 24, 2012 public comment in the COPPA rulemaking.

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<sup>1</sup> Other participants included Nick Ammann, Senior Manager for Federal Government Affairs at Apple, and Timothy Powderly, the Director for Federal Government Affairs at Apple. FTC participants included Beth Delaney, Attorney Advisor to Commissioner Rosch, David Koehler, Attorney Advisor to Commissioner Rosch, Mary Engle, Associate Director for the Division of Advertising Practices, and Kelsey Buntjer, Honors Paralegal to Commissioner Rosch.